[Submitting Counsel on Signature Page]

3

1

2

4 5

6

7

9

10

11

12

13

14

1516

17

18

19

20

21

2223

24

25

2627

28

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF CALIFORNIA OAKLAND DIVISION

IN RE: SOCIAL MEDIA ADOLESCENT ADDICTION/PERSONAL INJURY PRODUCTS LIABILITY LITIGATION

THIS FILING RELATES TO:

Joleen Youngers, et al. v. Meta Platforms, Inc. et al.; Case No. 4:23-cv-00547-YGR

Case No. 4:22-md-03047-YGR

MDL No. 3047

Honorable Yvonne Gonzalez Rogers

JOINT STIPULATED ADMINISTRATIVE MOTION AND [PROPOSED] ORDER TO MODIFY BRIEFING DEADLINES AND THE HEARING DATE ON PLAINTIFFS' MOTION TO REMAND 1

5

9

14

12

16

19

28

The Corporate Defendants¹ and Plaintiffs involved in *Youngers, et al. v. Meta Platforms, Inc. et al.*, No. 4:23-cv-00547-YGR, hereby submit this Joint Stipulated Administrative Motion and Proposed Order to modify the briefing deadlines and the hearing date relating to Plaintiffs' motion to remand.

The *Youngers* case was transferred to this MDL on February 1, 2023. *See* Dkt. No. 128. On January 19, 2024, Plaintiffs sought leave to file a motion to remand, *see* Dkt. No. 545 at 5-6, which the Court granted on January 29, 2024, *see* Dkt. No. 581 at 3. On February 15, 2024, Plaintiffs filed their motion to remand in member case no. 4:23-cv-00547-YGR, noticing it for hearing on March 26, 2024, *see Youngers v. Meta Platforms Inc.*, No. 4:23-cv-00547-YGR, Dkt. No. 64; however, the undersigned counsel for Meta did not receive a copy of the motion (because counsel had not entered appearances in that member case, as opposed to the MDL). Case Management Order No. 11 set the motion for hearing at the March 22, 2024 CMC. *See* Dkt. No. 645 at 1. Currently, Defendants' response to the motion is due on February 29, 2024, and Plaintiffs' reply is due on March 7, 2024.

In light of the above, Plaintiffs and the Corporate Defendants have conferred and respectfully request and agree, subject to Court approval, that the briefing deadlines and hearing on the motion to remand be modified as follows:

- March 11, 2024: Defendants' response to Plaintiffs' motion to remand due.
- March 25, 2024: Plaintiffs' reply in support of their motion to remand due.
- April 19, 2024: Hearing on Plaintiffs' motion to remand.

Dated: February 28, 2024 Respectfully submitted,

By: /s/ Anthony Bruster

ANTHONY BRUSTER New Mexico Bar No. 20283 BRUSTER PLLC 680 N. Carroll Ave., Suite 110 Southlake, Texas 76092

¹ The Corporate Defendants are Meta Platforms, Inc. ("Meta"), Snap, Inc., ByteDance Inc., and TikTok Inc.

Telephone: (817) 601-9564 Facsimile: (817) 796-2929 akbruster@brusterpllc.com Justin R. Kaufman Rosalind B. Bienvenu DURHAM, PITTARD & SPALDING, L. 505 Cerrillos Rd, Suite A209 Santa Fe, NM 87507 Telephone: (505) 986-0600 Facsimile: (505) 986-0632 jkaufman@dpslawgroup.com rbienvenu@dpslawgroup.com Attorneys for Plaintiffs COVINGTON & BURLING LLP By: /s/Ashley M. Simonsen Ashley M. Simonsen, SBN 275203 COVINGTON & BURLING LLP 1999 Avenue of the Stars Los Angeles, CA 90067 Telephone: +1 (424) 332-4749 Email: asimonsen@cov.com Phyllis A. Jones, pro hac vice Paul W. Schmidt, pro hac vice COVINGTON & BURLING LLP One CityCenter 850 Tenth Street, NW Washington, DC 20001-4956 Telephone: +1 (202) 662-6000 Facsimile: +1 (202) 662-6291 Email: psipones@cov.com		
akbruster@brusterpllc.com Justin R. Kaufman Rosalind B. Bienvenu DURHAM, PITTARD & SPALDING, L. 505 Cerrillos Rd., Suite A209 Santa Fe, NM 87507 Telephone: (505) 986-0632 jkaufman@dpslawgroup.com rbienvenu@dpslawgroup.com rbienvenu@dpslawgroup.com rbienvenu@dpslawgroup.com Attorneys for Plaintiffs COVINGTON & BURLING LLP By: /s/ Ashley M. Simonsen Ashley M. Simonsen, SBN 275203 COVINGTON & BURLING LLP 1999 Avenue of the Stars Los Angeles, CA 90067 Telephone: +1 (424) 332-4800 Facsimile: +1 (424) 332-4749 Email: asimonsen@cov.com Phyllis A. Jones, pro hac vice Paul W. Schmidt, pro hac vice Paul W. Schmidt, pro hac vice COVINGTON & BURLING LLP One CityCenter 850 Tenth Street, NW Washington, DC 20001-4956 Telephone: +1 (202) 662-6000 Facsimile: +1 (202) 662-6000 Facsimile: +1 (202) 662-6000 Facsimile: +1 (202) 662-6000 Facsimile: pschmidt@cov.com Attorneys for Defendant Meta Platforms. FAEGRE DRINKER LLP By: /s/ Andrea Roberts Pierson Andrea Roberts Pierson, pro hac vice Amy Fiterman, pro hac vice	1	
Justin R. Kaufman Rosalind B. Bienvenu DURHAM, PITTARD & SPALDING, L. 505 Cerrillos Rd., Suite A209 Santa Fe, NM 87507 Telephone: (505) 986-0600 Facsimile: (505) 986-0632 jkaufman@dpslawgroup.com rbienvenu@dpslawgroup.com Attorneys for Plaintiffs COVINGTON & BURLING LLP By: /s/ Ashley M. Simonsen Ashley M. Simonsen, SBN 275203 COVINGTON & BURLING LLP 1999 Avenue of the Stars Los Angeles, CA 90067 Telephone: +1 (424) 332-4749 Email: asimonsen@cov.com Phyllis A. Jones, pro hac vice Paul W. Schmidt, pro hac vice	2	
Rosalind B. Bienvenu DURHAM, PITTARD & SPALDING, L. 505 Cerrillos Rd., Suite A209 Santa Fe, NM 87507 Telephone: (505) 986-0632 jkaufman@dpslawgroup.com rbienvenu@dpslawgroup.com rbienvenu@dpslawgroup.com rbienvenu@dpslawgroup.com Attorneys for Plaintiffs COVINGTON & BURLING LLP By: /s/Ashley M. Simonsen Ashley M. Simonsen, SBN 275203 COVINGTON & BURLING LLP 1999 Avenue of the Stars Los Angeles, CA 90067 Telephone: +1 (424) 332-4800 Facsimile: +1 (424) 332-4749 Email: asimonsen@cov.com Phyllis A. Jones, pro hac vice Paul W. Schmidt, pro hac vice COVINGTON & BURLING LLP One CityCenter 850 Tenth Street, NW Washington, DC 20001-4956 Telephone: +1 (202) 662-6000 Facsimile: +1 (202) 662-6000 Facsimile: +1 (202) 662-6291 Email: pajones@cov.com Attorneys for Defendant Meta Platforms, FAEGRE DRINKER LLP By: /s/Andrea Roberts Pierson Andrea Roberts Pierson, pro hac vice Amy Fiterman, pro hac vice	3	Justin R. Kaufman
55 S05 Cerrillos Rd., Suite A209 Santa Fe, NM 87507 Telephone: (505) 986-0600 Facsimile: (505) 986-0632 jkaufman@dpslawgroup.com rbienvenu@dpslawgroup.com rbienvenu@dpslawgroup.com rbienvenu@dpslawgroup.com Attorneys for Plaintiffs 10	4	Rosalind B. Bienvenu
Telephone: (505) 986-0600 Facsimile: (505) 986-0632 jkaufman@dpslawgroup.com rbienvenu@dpslawgroup.com Attorneys for Plaintiffs COVINGTON & BURLING LLP By: (s/Ashley M. Simonsen Ashley M. Simonsen, SBN 275203 COVINGTON & BURLING LLP 1999 Avenue of the Stars Los Angeles, CA 90067 Telephone: +1 (424) 332-4709 Facsimile: +1 (424) 332-4749 Email: asimonsen@cov.com Phyllis A. Jones, pro hac vice Paul W. Schmidt, pro hac vice Paul W. Schmidt, pro hac vice COVINGTON & BURLING LLP One CityCenter 850 Tenth Street, NW Washington, DC 20001-4956 Telephone: +1 (202) 662-6291 Email: pajones@cov.com Email: pschmidt@cov.com Attorneys for Defendant Meta Platforms, FAEGRE DRINKER LLP By: (s/Andrea Roberts Pierson) Andrea Roberts Pierson, pro hac vice Amy Fiterman, pro hac vice	5	505 Cerrillos Rd., Suite A209
jkaufman@dpslawgroup.com rbienvenu@dpslawgroup.com Attorneys for Plaintiffs COVINGTON & BURLING LLP By: /s/Ashley M. Simonsen Ashley M. Simonsen, SBN 275203 COVINGTON & BURLING LLP 1999 Avenue of the Stars Los Angeles, CA 90067 Telephone: +1 (424) 332-4800 Facsimile: +1 (424) 332-4749 Email: asimonsen@cov.com Phyllis A. Jones, pro hac vice Paul W. Schmidt, pro hac vice COVINGTON & BURLING LLP One CityCenter 850 Tenth Street, NW Washington, DC 20001-4956 Telephone: +1 (202) 662-6000 Facsimile: +1 (202) 662-6291 Email: pajones@cov.com Attorneys for Defendant Meta Platforms, FAEGRE DRINKER LLP By: /s/Andrea Roberts Pierson Andrea Roberts Pierson, pro hac vice Amy Fiterman, pro hac vice	6	
Attorneys for Plaintiffs COVINGTON & BURLING LLP By: /s/Ashley M. Simonsen Ashley M. Simonsen, SBN 275203 COVINGTON & BURLING LLP 1999 Avenue of the Stars Los Angeles, CA 90067 Telephone: +1 (424) 332-4800 Facsimile: +1 (424) 332-4749 Email: asimonsen@cov.com Phyllis A. Jones, pro hac vice Paul W. Schmidt, pro hac vice COVINGTON & BURLING LLP One CityCenter 850 Tenth Street, NW Washington, DC 20001-4956 Telephone: +1 (202) 662-6291 Email: pajones@cov.com Email: pschmidt@cov.com Attorneys for Defendant Meta Platforms, FAEGRE DRINKER LLP By: /s/Andrea Roberts Pierson Andrea Roberts Pierson, pro hac vice	7	
COVINGTON & BURLING LLP By: /s/ Ashley M. Simonsen Ashley M. Simonsen, SBN 275203 COVINGTON & BURLING LLP 1999 Avenue of the Stars Los Angeles, CA 90067 Telephone: +1 (424) 332-4800 Facsimile: +1 (424) 332-4749 Email: asimonsen@cov.com Phyllis A. Jones, pro hac vice Paul W. Schmidt, pro hac vice COVINGTON & BURLING LLP One CityCenter 850 Tenth Street, NW Washington, DC 20001-4956 Telephone: +1 (202) 662-6000 Facsimile: +1 (202) 662-6000 Facsimile: +1 (202) 662-6291 Email: pajones@cov.com Email: psychmidt@cov.com Attorneys for Defendant Meta Platforms, FAEGRE DRINKER LLP By: /s/ Andrea Roberts Pierson Andrea Roberts Pierson, pro hac vice Amy Fiterman, pro hac vice	8	
By: <u>(s/Ashley M. Simonsen)</u> Ashley M. Simonsen, SBN 275203 COVINGTON & BURLING LLP 1999 Avenue of the Stars Los Angeles, CA 90067 Telephone: +1 (424) 332-4800 Facsimile: + 1 (424) 332-4749 Email: asimonsen@cov.com Phyllis A. Jones, pro hac vice Paul W. Schmidt, pro hac vice COVINGTON & BURLING LLP One CityCenter 850 Tenth Street, NW Washington, DC 20001-4956 Telephone: +1 (202) 662-6000 Facsimile: +1 (202) 662-6000 Facsimile: +1 (202) 662-6291 Email: pajones@cov.com Email: pschmidt@cov.com Attorneys for Defendant Meta Platforms, FAEGRE DRINKER LLP By: <u>(s/Andrea Roberts Pierson)</u> Andrea Roberts Pierson, pro hac vice	9	Attorneys for Plaintiffs
Ashley M. Simonsen, SBN 275203 COVINGTON & BURLING LLP 1999 Avenue of the Stars Los Angeles, CA 90067 Telephone: +1 (424) 332-4800 Facsimile: +1 (424) 332-4749 Email: asimonsen@cov.com Phyllis A. Jones, pro hac vice Paul W. Schmidt, pro hac vice COVINGTON & BURLING LLP One CityCenter 850 Tenth Street, NW Washington, DC 20001-4956 Telephone: +1 (202) 662-6000 Facsimile: +1 (202) 662-6000 Facsimile: +1 (202) 662-6291 Email: pajones@cov.com Email: pschmidt@cov.com Attorneys for Defendant Meta Platforms, FAEGRE DRINKER LLP By: /s/Andrea Roberts Pierson Andrea Roberts Pierson, pro hac vice Amy Fiterman, pro hac vice	10	COVINGTON & BURLING LLP
Ashley M. Simonsen, SBN 275203 COVINGTON & BURLING LLP 1999 Avenue of the Stars Los Angeles, CA 90067 Telephone: +1 (424) 332-4800 Facsimile: + 1 (424) 332-4749 Email: asimonsen@cov.com Phyllis A. Jones, pro hac vice Paul W. Schmidt, pro hac vice COVINGTON & BURLING LLP One CityCenter 850 Tenth Street, NW Washington, DC 20001-4956 Telephone: +1 (202) 662-6000 Facsimile: +1 (202) 662-6291 Email: pajones@cov.com Email: pschmidt@cov.com Attorneys for Defendant Meta Platforms, FAEGRE DRINKER LLP By: /s/ Andrea Roberts Pierson Andrea Roberts Pierson, pro hac vice Amy Fiterman, pro hac vice	11	By: <u>/s/ Ashley M. Simonsen</u>
1999 Avenue of the Stars Los Angeles, CA 90067 Telephone: +1 (424) 332-4800 Facsimile: +1 (424) 332-4749 Email: asimonsen@cov.com Phyllis A. Jones, pro hac vice Paul W. Schmidt, pro hac vice COVINGTON & BURLING LLP One CityCenter 850 Tenth Street, NW Washington, DC 20001-4956 Telephone: +1 (202) 662-6000 Facsimile: +1 (202) 662-6291 Email: pajones@cov.com Email: pschmidt@cov.com Attorneys for Defendant Meta Platforms, FAEGRE DRINKER LLP By: /s/ Andrea Roberts Pierson Andrea Roberts Pierson, pro hac vice Amy Fiterman, pro hac vice	12	Ashley M. Simonsen, SBN 275203
Los Angeles, CA 90067 Telephone: +1 (424) 332-4800 Facsimile: + 1 (424) 332-4749 Email: asimonsen@cov.com Phyllis A. Jones, pro hac vice Paul W. Schmidt, pro hac vice COVINGTON & BURLING LLP One CityCenter 850 Tenth Street, NW Washington, DC 20001-4956 Telephone: +1 (202) 662-6000 Facsimile: +1 (202) 662-6291 Email: pajones@cov.com Email: pschmidt@cov.com Attorneys for Defendant Meta Platforms, Attorneys for Defendant Meta Platforms, Andrea Roberts Pierson Andrea Roberts Pierson, pro hac vice Amy Fiterman, pro hac vice	13	
Facsimile: + 1 (424) 332-4749 Email: asimonsen@cov.com Phyllis A. Jones, pro hac vice Paul W. Schmidt, pro hac vice COVINGTON & BURLING LLP One CityCenter 850 Tenth Street, NW Washington, DC 20001-4956 Telephone: +1 (202) 662-6000 Facsimile: +1 (202) 662-6291 Email: pajones@cov.com Email: pschmidt@cov.com Attorneys for Defendant Meta Platforms, FAEGRE DRINKER LLP By: /s/ Andrea Roberts Pierson Andrea Roberts Pierson, pro hac vice Amy Fiterman, pro hac vice	14	Los Angeles, CA 90067
Phyllis A. Jones, pro hac vice Paul W. Schmidt, pro hac vice COVINGTON & BURLING LLP One CityCenter 850 Tenth Street, NW Washington, DC 20001-4956 Telephone: +1 (202) 662-6000 Facsimile: +1 (202) 662-6291 Email: pajones@cov.com Email: pschmidt@cov.com Attorneys for Defendant Meta Platforms, FAEGRE DRINKER LLP By: /s/ Andrea Roberts Pierson Andrea Roberts Pierson, pro hac vice Amy Fiterman, pro hac vice	15	Facsimile: + 1 (424) 332-4749
Paul W. Schmidt, pro hac vice COVINGTON & BURLING LLP One CityCenter 850 Tenth Street, NW Washington, DC 20001-4956 Telephone: +1 (202) 662-6000 Facsimile: + 1 (202) 662-6291 Email: pajones@cov.com Email: pschmidt@cov.com Attorneys for Defendant Meta Platforms, FAEGRE DRINKER LLP By: /s/ Andrea Roberts Pierson Andrea Roberts Pierson, pro hac vice Amy Fiterman, pro hac vice	16	Email: asimonsen@cov.com
COVINGTON & BURLING LLP One CityCenter 850 Tenth Street, NW Washington, DC 20001-4956 Telephone: +1 (202) 662-6000 Facsimile: + 1 (202) 662-6291 Email: pajones@cov.com Email: pschmidt@cov.com Attorneys for Defendant Meta Platforms, FAEGRE DRINKER LLP By: /s/Andrea Roberts Pierson Andrea Roberts Pierson, pro hac vice Amy Fiterman, pro hac vice	17	· · · · · · · · · · · · · · · · · · ·
850 Tenth Street, NW Washington, DC 20001-4956 Telephone: +1 (202) 662-6000 Facsimile: + 1 (202) 662-6291 Email: pajones@cov.com Email: pschmidt@cov.com Attorneys for Defendant Meta Platforms, FAEGRE DRINKER LLP By: /s/ Andrea Roberts Pierson Andrea Roberts Pierson, pro hac vice Amy Fiterman, pro hac vice	18	COVINGTON & BURLING LLP
Telephone: +1 (202) 662-6000 Facsimile: +1 (202) 662-6291 Email: pajones@cov.com Email: pschmidt@cov.com Attorneys for Defendant Meta Platforms, FAEGRE DRINKER LLP By: /s/ Andrea Roberts Pierson Andrea Roberts Pierson, pro hac vice Amy Fiterman, pro hac vice	19	850 Tenth Street, NW
Facsimile: + 1 (202) 662-6291 Email: pajones@cov.com Email: pschmidt@cov.com Attorneys for Defendant Meta Platforms, 201 FAEGRE DRINKER LLP By: /s/ Andrea Roberts Pierson Andrea Roberts Pierson, pro hac vice Amy Fiterman, pro hac vice	20	
Email: pschmidt@cov.com Attorneys for Defendant Meta Platforms, 2 FAEGRE DRINKER LLP By: /s/ Andrea Roberts Pierson Andrea Roberts Pierson, pro hac vice Amy Fiterman, pro hac vice	21	Facsimile: + 1 (202) 662-6291
FAEGRE DRINKER LLP By: /s/ Andrea Roberts Pierson Andrea Roberts Pierson, pro hac vice Amy Fiterman, pro hac vice	22	
FAEGRE DRINKER LLP By: /s/ Andrea Roberts Pierson Andrea Roberts Pierson, pro hac vice Amy Fiterman, pro hac vice		Attorneys for Defendant Meta Platforms, Inc.
By: <u>/s/ Andrea Roberts Pierson</u> Andrea Roberts Pierson, <i>pro hac vice</i> Amy Fiterman, <i>pro hac vice</i>		FAEGRE DRINKER LLP
Andrea Roberts Pierson, pro hac vice Amy Fiterman, pro hac vice		Ry: /s/ Andrea Roberts Pierson
Amy Fiterman, pro hac vice		·
FAEGRE DRINKER LLP		Amy Fiterman, pro hac vice
	28	FAEGRE DRINKER LLP

1	300 N. Meridian Street, Suite 2500
2	Indianapolis, IN 46204 Telephones + 1 (217) 227 0200
3	Telephone: + 1 (317) 237-0300 Facsimile: + 1 (317) 237-1000
	Email: andrea.pierson@faegredrinker.com
4	Email: amy.fiterman @faegredrinker.com
5	GEOFFREY DRAKE, pro hac vice
6	David Mattern, <i>pro ha vice</i> KING & SPALDING LLP
7	1180 Peachtree Street, NE, Suite 1600
	Atlanta, GA 30309
8	Tel.: 404-572-4600 Email: gdrake@kslaw.com
9	Email: dmattern@kslaw.com
10	Attorneys for Defendants TikTok Inc. and
11	ByteDance Inc.
12	MUNGER, TOLLES & OLSEN LLP
13	By: /s/ Jonathan H. Blavin
14	Jonathan H. Blavin, SBN 230269
15	MUNGER, TOLLES & OLSON LLP
16	560 Mission Street, 27th Floor San Francisco, CA 94105-3089
	Telephone: (415) 512-4000
17	Facsimile: (415) 512-4077
18	Email: jonathan.blavin@mto.com
19	Rose L. Ehler (SBN 29652)
20	Victoria A. Degtyareva (SBN 284199)
	Laura M. Lopez, (SBN 313450) Ariel T. Teshuva (SBN 324238)
21	MUNGER, TOLLES & OLSON LLP
22	350 South Grand Avenue, 50th Floor
23	Los Angeles, CA 90071-3426 Telephone: (213) 683-9100
	Facsimile: (213) 687-3702
24	Email: rose.ehler@mto.com
25	Email: victoria.degtyareva@mto.com Email: Ariel.Teshuva@mto.com
26	Louran A. Dall (nya haa wiga fouthoomina)
27	Lauren A. Bell (<i>pro hac vice</i> forthcoming) MUNGER, TOLLES & OLSON LLP
28	601 Massachusetts Ave., NW St.,
40	Suite 500 E

Document 654 Filed 02/29/24 Page 5 of 7 Case 4:22-md-03047-YGR

Washington, D.C. 20001-5369 Telephone: (202) 220-1100 Facsimile: (202) 220-2300 Email: lauren.bell@mto.com

Attorneys for Defendant Snap Inc.

[PROPOSED] ORDER

Before the Court is the parties' Joint Stipulated Administrative Motion to Modify Briefing

Deadlines and the Hearing Date on Plaintiffs' Motion to Remand in *Youngers, et al. v. Meta Platforms, Inc. et al.*, No. 4:23-cv-00547-YGR. The Court has reviewed the parties' Joint Stipulated

Administrative Motion and hereby orders that the following deadlines shall apply:

March 11, 2024	Defendants' response to Plaintiffs' motion to remand due.
March 25, 2024	Plaintiffs' reply in support of their motion to remand due.

Additionally, the Court will hear **ARGUMENT** on the motion to remand at the April 19, 2024, case management conference.

DATED: February 29, 2024

Mon. Yvonne Gonzalez Rogers United States District Judge

ATTESTATION

I, Ashley M. Simonsen, hereby attest, pursuant to N.D. Cal. Civil L.R. 5–1, that the concurrence to the filing of this document has been obtained from each signatory hereto.

Dated: February 28, 2024

By: <u>/s/Ashley M. Simonsen</u> Ashley M. Simonsen